

**MDL 1570 PLAINTIFFS' EXECUTIVE COMMITTEE  
FOR PERSONAL INJURY AND DEATH CLAIMS**

In re: Terrorist Attacks on September 11, 2001 (S.D.N.Y.)

Ronald L. Motley, (1944-2013) Jodi Westbrook Flowers / Donald A. Migliori, <i>Co-Chairs</i> MOTLEY RICE LLC	Andrew J. Maloney III, <i>Co-Liaison Counsel</i> KREINDLER & KREINDLER LLP
James P. Kreindler, <i>Co-Chair</i> KREINDLER & KREINDLER LLP	Robert T. Haefele, <i>Co-Liaison Counsel</i> MOTLEY RICE LLC

March 1, 2022

**BY ECF**

The Honorable George B. Daniels  
United States District Judge  
Daniel Patrick Moynihan United States Courthouse  
500 Pearl Street  
New York, NY 10007

The Honorable Sarah Netburn  
United States Magistrate Judge  
Thurgood Marshall United States Courthouse  
40 Foley Square  
New York, NY 10007

Re: *In Re: Terrorist Attacks on September 11, 2001*, 03 MDL 1570 (GBD) (SN)

Dear Judge Daniels and Judge Netburn:

As directed by the Court at the February 22, 2022 conference, we write on behalf of the MDL 1570 Plaintiffs' Executive Committee For Personal Injury And Death Claims, concerning the existing stay on enforcement of the writs of execution of the *Doe* and *Havlish* Plaintiffs.

The PECs have met and conferred with attorneys for the *Havlish* Plaintiffs and as a result of those meetings, the PEC has no objection to lifting of the stay entered at the U.S. government's request on October 15, 2021. ECF 7269. The attorneys for the *Havlish* Plaintiffs have represented that, consistent with what they stated in Court, they have no objection to the PEC presenting the positions of our clients in the turnover proceeding.<sup>1</sup>

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<sup>1</sup> See 02/22/2022 Transcript at 18 (Court: "And then just so I understand your position, once you file your motion for turnover, interested parties would be permitted to then participate either as an interpleader or otherwise, is that correct?" Mr. Wolosky: ... That is correct. We do not oppose any MDL parties participating in the briefing.")

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The PECs and the *Havlish* Plaintiffs continue to meet and confer regarding scheduling in the turnover proceeding and intend to present their proposals on March 3, 2022, as this Court previously ordered.

Respectfully Submitted,

By: /s/ Jodi Westbrook Flowers  
JODI WESTBROOK FLOWERS

By: /s/ James P. Kreindler  
JAMES P. KREINDLER

By: /s/ Jerry S. Goldman  
JERRY S. GOLDMAN